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Attorneys for the M/V CHLOE Z

FILED
DISTRICT COURT OF GUAM
JAN 23 2007 *mba*
MARY L.M. MORAN
CLERK OF COURT

IN THE UNITED STATES DISTRICT COURT
FOR THE TERRITORY OF GUAM

TCW SPECIAL CREDITS, et al.,

Plaintiffs,

v.

FISHING VESSEL M/V CHLOE Z, et al.,

Defendants.

Case No. 96-00055

DECLARATION OF DAVID
FREDERICK

I, David Frederick, declare as follows:

1. I am over the age of 18, am competent to be a witness and make the following declaration based on my personal knowledge.

2. I am a 1989 graduate of the University of Texas Law School. Subsequent to my graduation from the University of Texas, I served as a judicial law clerk for Judge Joseph Sneed of the United States Court of Appeals for the Ninth Circuit and then for United States Supreme Court Justice Byron White. I then served as an assistant to the Solicitor General at the United States Department of Justice for 5 years. While working

at the Solicitor General's office, I argued 12 cases before the United States Supreme Court and, since that time, have argued an additional 7 cases before that Court. My practice focuses heavily upon appellate advocacy, including a significant practice before the United States Supreme Court. I have authored several books including Supreme Court And Appellate Advocacy (West, 2003) and the The Art of Oral Advocacy (West, 2003).

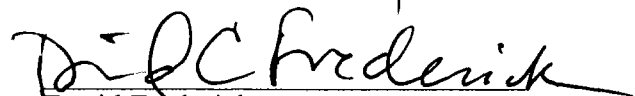
3. Based upon my experience and practice, I am personally familiar with the internal scheduling of matters that come before the Supreme Court.

4. I have been retained as Supreme Court Counsel in this matter. Our petition for writ of certiorari was filed with the Supreme Court on December 28, 2006. It was docketed with that Court on January 4, 2007. Under the current schedule a response brief is due on February 5, 2007. The judicial conference in which this matter is considered will occur on March 16, 2007, and an order regarding this petition would be anticipated on March 19, 2007.

5. It is often the case that the respondents seek an extension of time and 30 day extensions are routinely granted. Should respondents request such an extension of time, their response brief will be due on March 5, 2007, the Court conference will occur on April 13, 2007, and the Court's order would be anticipated on April 16, 2007.

I declare under penalty of perjury under the laws of the District of Columbia that the foregoing is true and correct.

DATED at Washington, D.C., this 12th day of January, 2007.


David Frederick

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